UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

DISH NETWORK L.L.C.,

Plaintiff.

V.

SHAHJAHAN DURRANI, d/b/a ZemTV, and ADAM LACKMAN, d/b/a www.tvaddons.ag, www.tvaddons.org, www.streamingboxes.com, and www.offshoregit.com,

Defendants.

Civil Action No. 4:17-cv-01618

DEFENDANT ADAM LACKMAN'S UNOPPOSED REQUEST FOR AN EXTENSION OF TIME

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On July 13, 2018, the Court entered an Order compelling the Defendant, Adam Lackman, to produce discoverable material within five days.

On July 16, 2018, counsel for the Defendant received notice from the Plaintiff that among the discoverable materials sought were two hard drives. The hard drives at issue contain documents seized from the Defendant during Canadian proceedings and were returned to his law firm therein no later than June 7, 2018. However, as the Defendant's Canadian law firm attests to [Exhibit 1], the Defendant was never notified of their return.

Defendant took immediate steps to obtain copies of the drives, however the Canadian law firm cannot deliver the drives to Defendant's counsel herein until tomorrow, July 19, 2018. Furthermore, because Defendant's counsel is unaware of the contents of the drives, they request five days to review the drives and produce a privilege log, if necessary, along with the drives.

Dated: July 18, 2018

/s/ Jason E. Sweet Jason E. Sweet (BBO# 668596) BOOTH SWEET LLP 32R Essex Street Cambridge, MA 02139

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Adam Lackman
Defendant

CERTIFICATE OF SERVICE

I hereby certify that on July 18, 2018, the foregoing document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

s/ Jason E. Sweet